

# PAYNE & FEARS

4 Park Plaza, Suite 1100  
Irvine, CA 92614  
T 949.851.1100  
F 949.851.1212

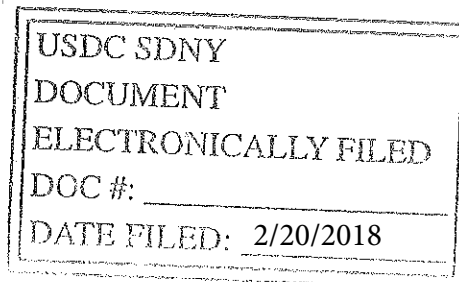
Benjamin A. Nix  
(949) 797-1249  
ban@paynefears.com

File No. 4863.002

February 16, 2018

**VIA ECF**

The Honorable Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street, Chambers 1350  
New York, New York 10007



Re: *GOJO Industries, Inc. v. Innovative Biodefense, Inc.*  
*Case No. 15-cv-2946 (PAC)*

Dear Judge Crotty:

We represent Defendant/Counter-Claimant Innovative Biodefense, Inc. in the above-referenced matter. As instructed by the Court, the parties have met and conferred regarding the various pre-trial deadlines and hereby jointly propose the following dates:

- |                                      |                   |
|--------------------------------------|-------------------|
| • Close of pending fact discovery    | April 30, 2018    |
| • Expert reports                     | June 29, 2018     |
| • Rebuttal expert reports            | September 7, 2018 |
| • Expert depositions                 | October 19, 2018  |
| • Dispositive motions                | November 9, 2018  |
| • Oppositions to dispositive motions | December 5, 2018  |
| • Replies to dispositive motions     | December 19, 2018 |

The parties respectfully request Your Honor "So Order" this letter below and thereafter electronically file same. We thank Your Honor in advance for your attention to this matter.

P & F

The Honorable Paul A. Crotty  
February 16, 2018  
Page 2

Sincerely,

*/s/ Benjamin A. Nix*

Benjamin A. Nix  
PAYNE & FEARS LLP

Sincerely,

*/s/ Adam K. Kurland*

Adam K. Kurland  
ADAM K. KURLAND  
ATTORNEY AT LAW, PC

BAN/RTM

cc: All counsel of record (via ECF)

SO ORDERED on this 16<sup>th</sup> day of February, 2018



---

Hon. Paul A. Crotty, U.S.D.J.